

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ADMIIN INC. d/b/a PARO INC., A Delaware Corporation,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:23-cv-4430</b>
	)	
<b>v.</b>	)	
	)	
<b>LUKE KOHAN an individual, and FIRMKEY SOLUTIONS LLC,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' EMERGENCY RULE 65 MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Plaintiff Admiin Inc. d/b/a Paro Inc. ("Paro" or the "Company"), by and through its undersigned attorneys, respectfully moves this Court for entry of a Temporary Restraining Order and Preliminary Injunction against Defendants Luke Kohan ("Kohan") and FirmKey Solutions LLC ("FirmKey"). In support of its Motion, Paro states:

1. Kohan is a former employee of Paro. As a condition of his employment with Paro, Kohan signed a restrictive covenant agreement, the terms of which bar Kohan from, among other conduct, disclosing Paro's confidential information, soliciting and conducting business with Paro's clients, and from owning or working for a competitor.

2. Since his resignation from Paro, Kohan has, among other things, breached the terms of his contract with Paro by founding and working for FirmKey, a direct competitor of Paro. Additionally, Kohan and FirmKey have misappropriated or are threatening to misappropriate Paro's confidential information and trade secrets, and FirmKey has tortiously interfered with Paro's and Kohan's contractual relationship. Kohan's and FirmKey's misconduct

breaches Kohan's contractual obligations to Paro and otherwise violates Kohan's and FirmKey's statutory and common law obligations to Paro.

3. In further support of this Motion, Paro incorporates the allegations in its Verified Complaint for Injunctive and Other Relief, as well as the arguments contained in its Memorandum of Law in Support of Rule 65 Motion for Temporary Restraining Order and Preliminary Injunction.

4. Paro respectfully requests that this Court enter the attached Temporary Restraining Order.

5. Paro will make every effort to notify Defendants of this Motion.

WHEREFORE, Plaintiff Admiin Inc. d/b/a Paro Inc. requests that this Court grant its Emergency Rule 65 Motion for Temporary Restraining Order and Preliminary Injunction, and enter the attached Temporary Restraining Order.

Dated: July 10, 2023

Respectfully submitted,

**ADMIIN INC. d/b/a PARO INC.**

By: /s/ Chad W. Moeller  
One of Its Attorneys

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<b>Plaintiff,</b>	)	<b>Case No.</b>
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<b>v.</b>	)	
	)	
<b>LUKE KOHAN an individual,</b>	)	
<b>and FIRMKEY SOLUTIONS LLC,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	

**TEMPORARY RESTRAINING ORDER**

This cause coming to be heard on Plaintiff's Emergency Rule 65 Motion for Temporary Restraining Order and Preliminary Injunction, due notice having been given, and the Court having been advised in the premises, IT IS HEREBY ORDERED THAT:

1. The purpose of this Temporary Restraining Order is to prevent further irreparable injury against Plaintiff by Defendants of the nature described to the Court by Plaintiff;
2. The Court finds that Defendants have been properly notified of the proceedings and have been sent copies of the appropriate pleadings in this matter;
3. The Court finds that Plaintiff has an ascertainable right in need of protection, including but not limited to, its confidential information and trade secrets, its right to maintain its client relationships, and its right to enforce the provisions of that certain contract with Defendant Kohan;
4. The Court finds that Plaintiff has established a likelihood of success on the merits;

5. The Court finds that, without this Temporary Restraining Order, Plaintiff is likely to suffer irreparable harm, including in the form of the theft of its confidential information and trade secrets, and the loss of its prospective, actual and/or repeat clients and/or experts;

6. The Court finds that Plaintiffs does not have an adequate remedy at law;

7. The Court finds that the balancing of the hardships to the parties favors Plaintiff and that the public interest would not be adversely affected by the issuance of this Temporary Restraining Order;

8. For a period of twelve (12) months following entry of this Order, Kohan is enjoined from being employed by or providing services to any competitor of Paro, including Defendant FirmKey Solutions LLC (“FirmKey”), and Defendant FirmKey is enjoined from employing Kohan during such period;

9. For a period of twelve (12) months following entry of this Order, Kohan and FirmKey are enjoined from directly or indirectly soliciting any of Paro’s clients or experts or inducing them to terminate their relationships with Paro;

10. Kohan and FirmKey are enjoined from obtaining, seeking to obtain, misappropriating, or attempting to misappropriate, Paro’s confidential information and trade secret information;

11. FirmKey is enjoined from interfering with Kohan’s contractual obligations to Plaintiff;

12. Kohan and FirmKey must return to Paro all originals and copies of Paro’s confidential information and trade secret information;

13. Plaintiff is entitled to its attorneys' fees and costs in having to bring this action, the amount of which will be determined by this Court at a later date;

14. The parties may engage in discovery on an expedited basis; and

15. This matter is scheduled for a preliminary injunction hearing on \_\_\_\_\_, 2023 at \_\_:\_\_ \_\_.m.

Judge: \_\_\_\_\_

Entered: July \_\_\_\_\_, 2023

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that she served a copy of the foregoing Plaintiffs'

Emergency Rule 65 Motion for Temporary Restraining Order and Preliminary Injunction on:

Julie Levinson Werner  
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1251 Avenue of the Americas  
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Luke Kohan  
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FirmKey Solutions LLC  
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by email, FedEx Overnight and messenger on this 10th day of July, 2023.

/s/ Collette A. Woghiren  
One of the Attorneys for Admiin Inc. d/b/a Paro Inc.

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